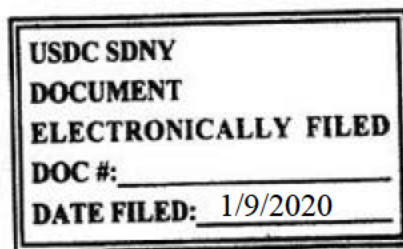


LAW OFFICES OF NOLAN KLEIN, P.A.

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January 9, 2020

VIA ECF and EMAIL: Torres NYSDChambers@nysd.uscourts.gov

Honorable Judge Analisa Torres
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Bowen v. Knolls Company, et al.
SDNY Case No.: 19-cv-08759

Dear Judge Torres,

We are the attorneys for Plaintiff, Daniel Bowen, in the above-referenced matter. Pursuant to the Court order dated December 11, 2019, the parties are to submit a proposed case management plan and joint letter. An initial pre-trial conference is scheduled for January 16, 2020 at 10:40 am, re-scheduled from November 20, 2019, December 8, 2019 and December 18, 2019.

On November 19, 2019, undersigned counsel received a letter from an attorney indicating that he represents Defendant Fresh King Market Inc., and that he would be filing a motion to extend the time to respond to the Complaint. However, to date, Fresh King Market Inc. has not made an appearance in the action. Today, we spoke to the attorney who previously contacted us, who advised that he had a meeting planned with his client and will call me back. With respect to Defendant Knolls Company, Plaintiff has not been able to perfect service of process, but is continuing its efforts.

Based on the foregoing, Plaintiff respectfully requests a brief extension to file a case management plan and joint letter. Plaintiff intends to seek a clerk's default should defendant Fresh King Market Inc. fail to appear by the close of business on January 13, 2020. Plaintiff respectfully requests that this Court adjourn the conference to an alternate date and time to allow Defendants to make an appearance. This is the fourth request for an adjournment of this conference, and the request will not prejudice any parties or affect any other scheduled dates.

Should the court have any further questions, please do not hesitate to contact the undersigned. We thank the Court for your time and consideration in this matter.

GRANTED. The initial pretrial conference scheduled for January 16, 2020 is ADJOURNED to **January 23, 2020, at 11:40 a.m.** By **January 16, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: January 9, 2020
New York, New York

A handwritten signature in black ink, appearing to be "Analisa Torres".

ANALISA TORRES
United States District Judge

Respectfully Submitted,

Law Offices of Nolan Klein, P.A.

By: /s/ Hector V. Ramirez
HECTOR V. RAMIREZ, ESQ. (HR3270)